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March 20, 2025

VIA ECF

Honorable Margaret M. Garnett, U.S.D.J. United States District Court, Southern District of New York

U.S. Specialty Insurance Company v. Lead Name of Certain Underwriters Re: Civil Action No.: 1:23-cv-08250-MMG

Dear Judge Garnett:

We represent Plaintiff U.S. Specialty Insurance Company ("USSIC") in the above-referenced matter. We are in receipt of the Court's instructions concerning the conference to address all outstanding discovery issues, which conference is scheduled to take place on March 28, 2025. ECF Nos. 59, 61. We write briefly to request that the date for the submission of pre-motion letters be adjourned in light of the outstanding discovery and pending conference.

Pursuant to the Court's Individual Rules and Practices section II(B)(9), a party desiring to move for summary judgment must file a letter with the Court within 14 days after the close of fact discovery requesting leave to so move. At present, the current discovery end date occurred on March 7, 2025. Thus, pursuant to the Court's individual practices, the parties' deadline to file letters requesting leave to file dispositive motions would be tomorrow, March 21, 2025. In light of the upcoming conference and remaining limited discovery to be taken in this case, we respectfully request that the submission of pre-motion letters be held in abeyance or adjourned.

Respectfully submitted,

/s/ Jeffrey A. Beer Jr. Jeffrey A. Beer Jr.

All counsel of record (via ECF) cc:

4896-6346-0908, v. 1

GRANTED. The deadline to file pre-motion letters is stayed pending the March 28, 2025 conference, and the post-discovery conference currently set for April 4 is adjourned sine die. At the March 28 conference, all counsel should be prepared to set an expedited schedule for the limited discovery that remains to be completed, and a corresponding post-discovery schedule.

SO ORDERED. Dated March 21, 2025.

UNITED STATES DISTRICT JUDGE

MORRISTOWN

TRENTON

NEW YORK CITY